

**Fill in this information to identify the case:**

Debtor 1 Maureen Elizabeth Calder

Debtor 2  
(Spouse, if filing)

United States Bankruptcy Court for the: Eastern District of PA

Case number 18-16521 AMC

**Form 4100R**

**Response to Notice of Final Cure Payment**

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

**Part 1: Mortgage Information**

Name of Creditor: M&T Bank

Court claim no. (if known): 7-2

Last 4 digits of any number you use to identify the debtor's account: 0453

Property address:

360 Radford Court  
Glen Mills, PA 19342

**Part 2: Prepetition Default Payments**

Check one:

☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.

☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ \_\_\_\_\_

**Part 3: Postpetition Mortgage Payment**

Check one:

☐ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on:

☒ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due:	(a)	\$ <u>3,278.10</u>
b. Total fees, charges, expenses, escrow, and costs outstanding:	+ (b)	\$ <u>1,453.00</u>
c. <b>Total.</b> Add lines a and b.	(c)	\$ <u>4,731.10</u>

Creditor asserts that the debtor(s) are contractually obligated for 11 / 01 / 2023  
the postpetition payment(s) that first became due on:

Debtor(s) Maureen Elizabeth Calder  
First Name Middle Name Last Name

Case Number (if known): 18-16521 AMC

**Part 4: Itemized Payment History**

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

**Part 5: Sign Here**

**The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.**

*Check the appropriate box::*

- ☐ I am the creditor.  
☒ I am the creditor's authorized agent.

**I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.**

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

\*/s/ Mark A. Cronin

Date 12/08/2023

Mark Cronin  
08 Dec 2023, 11:45:34, EST

KML Law Group, P.C.  
701 Market Street, Suite 5000  
Philadelphia, PA 16106  
215-627-1322  
[bkgroup@kmlawgroup.com](mailto:bkgroup@kmlawgroup.com)  
Attorney for Creditor

### CHAPTER 13 BANKRUPTCY PAYMENT HISTORY

Loan Number:  
Mortgagor Last  
Name:

Herron, M

Property  
Address:

360 Radford Court  
Glen Mills, PA 19342

Date Produced:

10/17/2018

Filing Date: 9/30/2018

Case Number: 18-16521

Investor: M&T Bank

Next Analysis:

Processor ID:

### POST PETITION PAYMENT HISTORY

TRANSACTION DATE	DUE DATE	AMOUNT RECEIVED	AMOUNT DUE	PAYMENT APPLIED TO	TRANSACTION DESCRIPTION		TO/FROM SUSPENSE	SUSPENSE BALANCE
10/3/2018		\$450.00		Suspense	Suspense	\$450.00	\$450.00	\$450.00
10/16/2018		\$700.00		Suspense	Suspense	\$700.00	\$700.00	\$1,150.00
10/29/2018		\$100.00		Suspense	Suspense	\$100.00	\$100.00	\$1,250.00
10/31/2018	10/1/2018	\$550.00	\$1,653.33	10/1/2018	payment	-\$1,103.33	-\$1,103.33	\$146.67
11/23/2018		\$400.00	\$0.00	Suspense	Suspense	\$400.00	\$400.00	\$546.67
12/5/2018		\$500.00	\$0.00	Suspense	Suspense	\$500.00	\$500.00	\$1,046.67
1/2/2019	11/1/2018	\$700.00	\$1,653.33	11/1/2018	payment	-\$953.33	-\$953.33	\$93.34
1/29/2019		\$500.00	\$0.00	Suspense	Suspense	\$500.00	\$500.00	\$593.34
2/5/2019		\$424.00	\$0.00	Suspense	Suspense	\$424.00	\$424.00	\$1,017.34
3/26/2019	12/1/2018	\$1,700.00	\$1,653.33	12/1/2018	payment	\$46.67	\$46.67	\$1,064.01
5/7/2019	1/1/2019	\$1,653.33	\$1,653.33	1/1/2019	payment	\$0.00	\$0.00	\$1,064.01
6/18/2019	2/1/2019	\$1,653.33	\$1,653.33	2/1/2019	payment	\$0.00	\$0.00	\$1,064.01
7/10/2019	3/1/2019	\$1,842.65	\$1,653.33	3/1/2019	payment	\$189.32	\$189.32	\$1,253.33
7/23/2019	4/1/2019	\$1,031.00	\$1,653.33	4/1/2019	payment	-\$622.33	-\$622.33	\$631.00
	<b>Agreed order filed 8/23/19</b> <b>5/1/19 to 8/1/19 4 payments @ \$1653.33 = \$6,613.32</b> <b>Suspense \$631.00 + attorney fees \$1031 = \$7013.32</b> <b>to be added to plan - APOC Needed</b>					\$0.00	\$0.00	\$631.00
	suspense	-\$631.00				-\$631.00	-\$631.00	\$0.00
8/14/2019		\$852.55	\$0.00	suspense		\$852.55	\$852.55	\$852.55
10/8/2019	9/1/2019	\$1,653.33	\$1,653.33	9/1/2019	payment	\$0.00	\$0.00	\$852.55
11/19/2019	10/1/2019	\$1,653.33	\$1,653.33	10/1/2019	payment	\$0.00	\$0.00	\$852.55
12/31/2019		\$1,000.00	\$0.00	suspense		\$1,000.00	\$1,000.00	\$1,852.55
1/14/2020	11/1/2019	\$1,653.33	\$1,653.33	11/1/2019	payment	\$0.00	\$0.00	\$1,852.55
1/16/2020	12/1/2019	\$653.33	\$1,653.33	12/1/2019	payment	-\$1,000.00	-\$1,000.00	\$852.55
2/12/2020	1/1/2020	\$1,653.33	\$1,653.33	1/1/2020	payment	\$0.00	\$0.00	\$852.55
4/7/2020	2/1/2020	\$1,653.33	\$1,653.33	2/1/2020	payment	\$0.00	\$0.00	\$852.55
5/5/2020	3/1/2020	\$1,653.33	\$1,644.97	3/1/2020	payment	\$8.36	\$8.36	\$860.91
5/19/2020	4/1/2020	\$1,653.33	\$1,644.97	4/1/2020	payment	\$8.36	\$8.36	\$869.27
6/9/2020	5/1/2020	\$784.06	\$1,644.97	5/1/2020	payment	-\$860.91	-\$860.91	\$8.36
6/15/2020	6/1/2020	\$1,644.97	\$1,644.97	6/1/2020	payment	\$0.00	\$0.00	\$8.36



**CHAPTER 13 BANKRUPTCY PAYMENT HISTORY**

TRANSACTION DATE	DUE DATE	AMOUNT RECEIVED	AMOUNT DUE	PAYMENT APPLIED TO	TRANSACTION DESCRIPTION		TO/FROM SUSPENSE	SUSPENSE BALANCE
9/21/2020	7/1/2020	\$1,644.97	\$1,644.97	7/1/2020	payment	\$0.00	\$0.00	\$8.36
10/30/2020	8/1/2020	\$1,644.97	\$1,644.97	8/1/2020	payment	\$0.00	\$0.00	\$8.36
12/1/2020	9/1/2020	\$1,700.00	\$1,644.97	9/1/2020	payment	\$55.03	\$55.03	\$63.39
1/11/2021	10/1/2020	\$1,700.00	\$1,644.97	10/1/2020	payment	\$55.03	\$55.03	\$118.42
1/25/2020		\$1,000.00	\$0.00	suspense		\$1,000.00	\$1,000.00	\$1,118.42
2/11/2021	11/1/2020	\$700.00	\$1,644.97	11/1/2020	payment	-\$944.97	-\$944.97	\$173.45
3/8/2021	12/1/2020	\$1,700.00	\$1,645.31	12/1/2020	payment	\$54.69	\$54.69	\$228.14
3/18/2021		\$945.31	\$0.00	Suspense	Suspense	\$945.31	\$945.31	\$1,173.45
3/22/2021	1/1/2021	\$1,645.31	\$1,645.31	1/1/2021	payment	\$0.00	\$0.00	\$1,173.45
3/26/2021	2/1/2021	\$1,645.31	\$1,645.31	2/1/2021	payment	\$0.00	\$0.00	\$1,173.45
4/19/2021	3/1/2021	\$2,117.17	\$1,645.31	3/1/2021	payment	\$471.86	\$471.86	\$1,645.31
4/19/2021	4/1/2021	\$0.00	\$1,645.31	4/1/2021	payment	-\$1,645.31	-\$1,645.31	\$0.00
5/28/2021	5/1/2021	\$1,645.31	\$1,645.31	5/1/2021	payment	\$0.00	\$0.00	\$0.00
7/12/2021	6/1/2021	\$1,645.31	\$1,645.31	6/1/2021	payment	\$0.00	\$0.00	\$0.00
8/4/2021		\$15.00		Suspense	Suspense	\$15.00	\$15.00	\$15.00
8/23/2021	7/1/2021	\$1,654.00	\$1,645.31	7/1/2021	payment	\$8.69	\$8.69	\$23.69
10/5/2021	8/1/2021	\$1,654.00	\$1,645.31	8/1/2021	payment	\$8.69	\$8.69	\$32.38
11/15/2021	9/1/2021	\$1,700.00	\$1,645.31	9/1/2021	payment	\$54.69	\$54.69	\$87.07
12/13/2021	10/1/2021	\$1,654.00	\$1,645.31	10/1/2021	payment	\$8.69	\$8.69	\$95.76
1/24/2022	11/1/2021	\$1,654.00	\$1,645.31	11/1/2021	payment	\$8.69	\$8.69	\$104.45
2/9/2022	12/1/2021	\$1,654.00	\$1,635.70	12/1/2021	payment	\$18.30	\$18.30	\$122.75
2/23/2022	1/1/2022	\$1,654.00	\$1,635.70	1/1/2022	payment	\$18.30	\$18.30	\$141.05
3/21/2022	2/1/2022	\$3,150.00	\$1,635.70	2/1/2022	payment	\$1,514.30	\$1,514.30	\$1,655.35
3/21/2022	3/1/2022	\$0.00	\$1,635.70	3/1/2022	payment	-\$1,635.70	-\$1,635.70	\$19.65
4/5/2022	4/1/2022	\$1,645.00	\$1,635.70	4/1/2022	payment	\$9.30	\$9.30	\$28.95
6/1/2022	5/1/2022	\$1,635.70	\$1,635.70	5/1/2022	payment	\$0.00	\$0.00	\$28.95
7/25/2022	6/1/2022	\$1,635.70	\$1,635.70	6/1/2022	payment	\$0.00	\$0.00	\$28.95
8/8/2022	7/1/2022	\$1,635.70	\$1,635.70	7/1/2022	payment	\$0.00	\$0.00	\$28.95
9/19/2022	8/1/2022	\$1,635.70	\$1,635.70	8/1/2022	payment	\$0.00	\$0.00	\$28.95
11/15/2022	9/1/2022	\$1,635.70	\$1,635.70	9/1/2022	payment	\$0.00	\$0.00	\$28.95
12/12/2022		\$1,135.70		Suspense	Suspense	\$1,135.70	\$1,135.70	\$1,164.65
12/27/2022	10/1/2022	\$500.00	\$1,635.70	10/1/2022	payment	-\$1,135.70	-\$1,135.70	\$28.95
12/29/2022	suspense	\$400.00		Suspense	Suspense	\$400.00	\$400.00	\$428.95
12/30/2022	suspense	\$500.00		Suspense	Suspense	\$500.00	\$500.00	\$928.95
1/10/2023	11/1/2022	\$1,035.70	\$1,635.70	11/1/2022	payment	-\$600.00	-\$600.00	\$328.95
1/23/2023	12/1/2022	\$1,635.70	\$1,639.05	12/1/2022	payment	-\$3.35	-\$3.35	\$325.60
2/6/2023		\$1,306.75			Suspense	\$1,306.75	\$1,306.75	\$1,632.35
A/O Filed for 1/1/23-2/1/23 payments minus suspense of \$1632.35 - one lump payment						\$0.00	\$0.00	\$1,632.35
2/22/2023	1/1/2023	\$1,635.70	\$1,639.05	1/1/2023	payment	-\$3.35	-\$3.35	\$1,629.00
2/27/2023		\$3.35			Suspense	\$3.35	\$3.35	\$1,632.35

**CHAPTER 13 BANKRUPTCY PAYMENT HISTORY**

TRANSACTION DATE	DUE DATE	AMOUNT RECEIVED	AMOUNT DUE	PAYMENT APPLIED TO	TRANSACTION DESCRIPTION		TO/FROM SUSPENSE	SUSPENSE BALANCE
4/3/2023	2/1/2023	\$1,639.05	\$1,639.05	2/1/2023	payment	\$0.00	\$0.00	\$1,632.35
5/15/2023	3/1/2023	\$1,639.05	\$1,639.05	3/1/2023	payment	\$0.00	\$0.00	\$1,632.35
6/12/2023	4/1/2023	\$1,639.05	\$1,639.05	4/1/2023	payment	\$0.00	\$0.00	\$1,632.35
7/10/2023	5/1/2023	\$1,639.05	\$1,639.05	5/1/2023	payment	\$0.00	\$0.00	\$1,632.35
8/21/2023	6/1/2023	\$1,655.00	\$1,639.05	6/1/2023	payment	\$15.95	\$15.95	\$1,648.30
8/21/2023	7/1/2023	\$0.00	\$1,639.05	7/1/2023	payment	-\$1,639.05	-\$1,639.05	\$9.25
9/6/2023		\$1,000.00			Suspense	\$1,000.00	\$1,000.00	\$1,009.25
9/11/2023	8/1/2023	\$655.00	\$1,639.05	8/1/2023	payment	-\$984.05	-\$984.05	\$25.20
	9/1/2023		\$1,639.05			-\$1,639.05	-\$1,639.05	-\$1,613.85
	10/1/2023		\$1,639.05			-\$1,639.05	-\$1,639.05	-\$3,252.90
						\$0.00	\$0.00	-\$3,252.90

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: Maureen Elizabeth Calder aka  
Maureen E. Herron aka Maureen Herron  
aka Maureen Calder**

**Debtor(s)**

**M&T Bank**

**Movant**

**vs.**

**Maureen Elizabeth Calder aka Maureen  
E. Herron aka Maureen Herron aka  
Maureen Calder**

**Debtor(s)**

**Kenneth E. West,**

**Trustee**

**BK NO. 18-16521 AMC**

**Chapter 13**

**Related to Claim No. 7-2**

**CERTIFICATE OF SERVICE**

**RESPONSE TO NOTICE OF FINAL CURE MORTGAGE PAYMENT**

I, Mark A. Cronin of KML Law Group, P.C., certify that I am, and at all times hereinafter mentioned was, more than 18 years of age and that on December 8, 2023, I served the above captioned pleading, filed in the proceeding on the parties at the addresses shown below:

Debtor(s)

Maureen Elizabeth Calder aka Maureen E. Herron  
aka Maureen Herron aka Maureen Calder  
360 Radford Court  
Glen Mills, PA 19342

Attorney for Debtor(s) (via ECF)

Anthony A. Frigo  
The Law Offices of Anthony A. Frigo  
175 Strafford Ave., Suite One  
Wayne, PA 19468

Trustee (via ECF)

Kenneth E. West  
Office of the Chapter 13 Standing Trustee  
1234 Market Street - Suite 1813  
Philadelphia, PA 19107

Method of Service: electronic means or first-class mail.

Dated: December 8, 2023

/s/ Mark A. Cronin

Mark A. Cronin Esquire  
Attorney I.D. 58240  
KML Law Group, P.C.  
BNY Mellon Independence Center  
701 Market Street, Suite 5000  
Philadelphia, PA 19106  
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